

Exhibit A

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re

TPC GROUP INC, *et al.*,

*Debtors.*¹

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

BAYSIDE CAPITAL, INC. and CERBERUS
CAPITAL MANAGEMENT, L.P

Plaintiffs,

v.

TPC GROUP INC.,

Defendant,

-and-

THE AD HOC NOTEHOLDER GROUP,

Intervenor-Defendant.

Civ. Case No. 22-_____

Adv. Pro. No. 22-50372 (CTG)

**ORDER GRANTING
MOTION TO SEAL APPENDIX REGARDING EMERGENCY MOTION OF
APPELLANTS BAYSIDE CAPITAL, INC. AND CERBERUS CAPITAL
MANAGEMENT, L.P. FOR STAY OF EFFECTIVENESS AND ENFORCEMENT OF
ORDER PENDING APPEAL PURSUANT TO BANKRUPTCY RULE 8007**

¹ The Debtors in these Chapter 11 cases, and the last four digits of their federal tax identification numbers, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77042.

At Wilmington this _____ day of _____, 2022, having considered the *Motion to Seal Appendix Regarding Emergency Motion of Appellants Bayside Capital, Inc. and Cerberus Capital Management, L.P. For Stay of Effectiveness and Enforcement of Order Pending Appeal Pursuant To Bankruptcy Rule 8007*; IT IS HEREBY ORDERED that the motion is GRANTED.

United States District Judge